

# **EXHIBIT 1**

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

PA ADVISORS, LLC, Plaintiff,	§ § § §	
v.	§	Civil Action No. 2:07-cv-480-RRR
GOOGLE INC., et al., Defendants.	§ § § § §	JURY TRIAL DEMANDED

**nXn TECH, LLC'S WITNESS LIST**

nXn Tech, LLC (f/k/a PA Advisors, LLC) (“nXn”) submits this witness list as Exhibit 1 to the parties’ Joint Pretrial Order.

**I. Plaintiff’s Witnesses**

nXn identifies the name and, if not previously provided, the address and telephone number of each witness it may present at trial other than solely for impeachment — separately identifying those the party expects to present and those it may call if the need arises, during either the jury trial or any inequitable conduct bench trial. These identifications are based on information reasonably available to nXn at the present time. nXn reserves the right to supplement or modify this list and reserves the right to designate testimony and/or call to testify any persons who are identified by either Defendant Yahoo or Defendant Google on their respective witness lists. Specifically, if any witness previously designated by either of the Defendants as “will call” does not appear live at trial, nXn reserves the right to designate deposition testimony at the time of trial for that witness.

## **II. Witnesses Plaintiff Expects to Present At Trial:<sup>1</sup>**

1. Lee Bradley Sheafe
2. Dr. V. Thomas Rhyne
3. Ilya Geller<sup>2</sup>
4. Stephen L. Becker
5. Alan Gordon

## **III. Witnesses Plaintiff May Present At Trial If the Need Arises as Live Witnesses or by Deposition**

At present, Plaintiff expects that it may call the following witnesses in person at trial or by video or stenographic deposition. Any exhibit discussed by the witness in the designated testimony is hereby incorporated by reference into nXn's Exhibit List and may be offered into evidence as the testimony is presented.

1. Sanjay Datta,
2. Patel Dev
3. Ivan Markman
4. Gabriel Mattera
5. Carlton Robinson
6. Charles Schulman
7. Luke Yeh

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<sup>1</sup> All of these witness may be contacted through counsel for the Plaintiff, specifically: (1) Mr. Marc Fenster/Russ, August & Kabat, 12424 Wilshire Blvd., 12th Floor, Los Angeles, CA 90025 (310) 826-7474; (2) Mr. David Pridham/ Law Office of David Pridham, 25 Linden Road, Barrington, Rhode Island 02806 Tel: (401) 633-7247; and/or (3) Andrew W. Spangler/Spangler Law, P.C., 104 E. Houston Street, Ste. 135 Marshall, Texas 75670 (903) 935-3443.

<sup>2</sup> Plaintiff anticipates at this time that it will call Mr. Geller as a witness at the time of trial. Plaintiff reserves the right to call Mr. Geller by deposition, however, if he is in fact not presented at trial.

8. Chauman Brewer
9. Edward Etkin
10. Bartholomew Furrow
11. Matthew Hall
12. Brian Horling
13. Michael Jahr
14. Ashvin Kannan
15. David Kolm
16. Ken Kronquist
17. Soren Riise
18. Ben Shahshahani
19. Zachary Zhang
20. Bahman Rabii

Plaintiff also reserves the right to and may offer the video deposition testimony of any and/or all witnesses called by Defendants at trial for purposes of impeachment, including but not limited to offering or otherwise using any exhibit(s) referenced in such video deposition. This includes any witnesses called by Defendants at trial as live witnesses, as video-designated witnesses, or any other type of offer of testimony at trial.

Dated: March 1, 2010

**APPROVED AS TO FORM AND SUBSTANCE:**

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